

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 20-cv-954**

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and VITAL
MANAGEMENT SERVICES, INC.,

Defendants.

**CONSENT MOTION TO
EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
MOTION OF NON-PARTY
FIRST CITIZENS FOR
PROTECTIVE ORDER**

Pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local Rule 6.1(a), Plaintiff Farhad Azima (“Plaintiff”) respectfully requests and moves for an extension of time to respond to the Motion of Non-Party First Citizens Bank & Trust Co. (“First Citizens”) for Protective Order, ECF No. 225, with the consent of First Citizens. In support of this motion, Plaintiff shows the following:

1. Plaintiff filed the complaint against Defendants on October 15, 2020. ECF No. 1.
2. The law firm of Womble Bond Dickinson (US) LLP (“Womble”) is local and co-counsel on this matter along with counsel from the law firm of Miller & Chevalier Chartered.

3. On March 27, 2023, Plaintiff served First Citizens with a subpoena *duces tecum*. ECF No. 196-1.

4. On May 15, 2023, First Citizens moved for a protective order. ECF No. 225.

5. Counsel from Womble believe they may have a potential conflict in representing Plaintiff in its response to First Citizens' Motion for Protective Order and have conferred with counsel for First Citizens about the issue.

6. Counsel for First Citizens has agreed to extend Plaintiff's time to respond to First Citizens' Motion for a Protective Order until June 2, 2023, while the parties discuss the potential conflict and, if necessary, negotiate a waiver or find alternative counsel to sign the response to the Motion for Protective Order.

7. Plaintiff's response to the motion is due on May 30, 2023, and thus has not yet expired.

8. This motion is made for good cause and not for the purpose of delay.

WHEREFORE, Plaintiff respectfully requests that the Court extend the deadline for Plaintiff to respond to First Citizens' Motion for Protective Order up to and including Friday, June 2, 2023.

This, the 30th day of May, 2023.

WOMBLE BOND DICKINSON (US) LLP

/s/ Ripley Rand

Ripley Rand

North Carolina Bar No. 22275

Christopher W. Jones

North Carolina Bar No. 27625

Jonathon Townsend

North Carolina State Bar No. 51751

555 Fayetteville Street, Suite 1100

Raleigh, North Carolina 27601

Phone: 919-755-2100

Fax: 919-755-2150

Email: ripley.rand@wbd-us.com

chris.jones@wbd-us.com

MILLER & CHEVALIER CHARTERED

Kirby D. Behre (*pro hac vice*)

Timothy P. O'Toole (*pro hac vice*)

Brian A. Hill (*pro hac vice*)

Ian Herbert (*pro hac vice*)

Calvin Lee (*pro hac vice*)

900 16th Street, NW

Washington, D.C. 20006

Telephone: (202) 626-5800

Fax: (202) 626-5801

Email: kbehre@milchev.com

Counsel for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
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Defendants.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic notification of this Notice to the following attorneys:

Kieran J. Shanahan, Esq.
Brandon S. Neuman, Esq.
Jeffrey M. Kelly, Esq.
Nathaniel J. Pencook, Esq.
GlenLake One
4140 Parklake Avenue - Suite 200
Raleigh, NC 27612
kieran.shanahan@nelsonmullins.com
brandon.neuman@nelsonmullins.com
jeff.kelly@nelsonmullins.com
nate.pencook@nelsonmullins.com
Telephone: 919.329.3800
Facsimile: 919.329.3799

John Charles Quinn
Kaplan Hecker & Fink LLP
350 Fifth Avenue, Ste. 63rd Floor
New York, NY 10118
Email: jquinn@kaplanhecker.com
Tel.: 212-763-0883
Fax.: 212-564-0883

Kearns Davis
Daniel D. Adams
Brooks Pierce McLendon Humphrey & Leonard LLP
PO Box 26000
Greensboro, NC 27420-6000
Email: kdavis@brookspierce.com
Email: dadams@brookspierce.com
Tel.: 336-373-8850
Fax.: 336-378-1001

Counsel for Dechert LLP

Kieran Shanahan, Esq.
Shanahan Law Group
128 East Hargett Street, Suite 300
Raleigh, NC 27601
Tel.: 919-264-7515
Email: kieran@shanahanlawgroup.com

Counsel for Shanahan Law Group

Walter C. Holton, Jr. Holton Law Firm, PLLC
857 West Fifth Street
Winston-Salem, NC 27101
Email: wholton@walterholton.com
Tel.: 336-777-3480
Fax.: 336-722-3478

Counsel for Christopher Swecker and Christopher Swecker Enters. LLC

Brett L. Lawrence (NC Bar No. 45483)
Bradley Arant Boult Cummings, LLP
214 N. Tryon Street, Suite 3700
Charlotte, NC 28202
Telephone: (704) 338-6125
Facsimile: (704) 332-8858
E-mail: blawrence@bradley.com

Attorney for First Citizens Bank & Trust Co

This, the 30th day of May, 2023.

**WOMBLE BOND DICKINSON (US)
LLP**

/s/ Ripley Rand

Ripley Rand
North Carolina State Bar No. 22275
555 Fayetteville Street, Suite 1100
Raleigh, NC 27601
Telephone: (919) 755-8125
Facsimile: (919) 755-6752
Email: ripley.rand@wbd-us.com

Counsel for Plaintiff